

**IN THE UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

<b>RUTH SMITH, Individually and as Widow</b>	)	
<b>for the Use and Benefit of Herself and the</b>	)	
<b>Next of Kin of RICHARD SMITH, Deceased,</b>	)	<b>Case #: 3:05-00444</b>
	)	<b>Judge Trauger</b>
<b>Plaintiff,</b>	)	
	)	
<b>-against-</b>	)	
	)	
<b>PFIZER INC., PARKE-DAVIS,</b>	)	
<b>a division of Warner-Lambert Company</b>	)	
<b>and Warner-Lambert Company LLC,</b>	)	
<b>WARNER-LAMBERT COMPANY,</b>	)	
<b>WARNER-LAMBERT COMPANY LLC and</b>	)	
<b>JOHN DOE(S) 1-10,</b>	)	
	)	
<b>Defendants.</b>	)	

**PLAINTIFF'S MOTION FOR PRIOR APPROVAL TO  
EXCEED THE THREE-EXPERT WITNESS LIMITATION  
UNDER LOCAL RULE 39.1(c)(6)(a), AND FOR EXPRESS PERMISSION  
TO BRING LAPTOP COMPUTERS INTO THE COURTROOM FOR  
USE DURING THE TRIAL OF THIS ACTION UNDER LOCAL RULE  
83.02(a)(2) AND PRACTICE AND PROCEDURE MANUAL RULE V(M)**

Plaintiff Ruth Smith, as the Widow for the use and benefit of herself and the next of kin of Richard Smith, deceased, by and through her undersigned counsel, respectfully requests an order granting Plaintiff prior approval to exceed the three-expert witness limitation under Local Rule 39.01(c)(6)(a), due to a myriad of issues in this complex products liability action which requires various expert opinions. Further, Plaintiff requests express permission from this Court, under Local Rule 83.02(2) and this Court's Practice and Procedure Manual V. Trial Procedures (M) Courtroom Technology, to bring laptop computers into the courtroom for use during the trial of this action.

This Motion is supported by Plaintiff's Memorandum in Support and exhibit annexed thereto, and the Declaration of Keith L. Altman submitted herewith.

Dated: April 16, 2010

Respectfully submitted,

THE LANIER LAW FIRM, P.L.L.C.

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- and -

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- and -

BARRETT & ASSOCIATES, P.A.

By: /s/ Charles F. Barrett  
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*Attorneys for Plaintiff Ruth Smith*

**CERTIFICATE OF SERVICE**

I hereby certify that on this the 16th day of April, 2010, I electronically filed the foregoing document with the Clerk of the Court, United States District Court for the Middle District of Tennessee, using the CM/ECF system. True and correct copies of the foregoing documents are being served via the Court's CM/ECF system on the following:

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**/s/ Kenneth B. Fromson**  
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